

DEC 16 2003

Via fax and letter

Anthony Cinque, Case Manager  
Bureau of Federal Case Management  
New Jersey Department of Environmental Protection  
401 East State Street  
P. O. Box 028  
Trenton, New Jersey 08625

RE: EPA Comments on The Quarterly Monitoring Report, 3<sup>rd</sup> Quarter 2003  
L.E. Carpenter Superfund Site, Wharton, New Jersey

Dear Mr. Cinque:

The United States Environmental Protection Agency (EPA) has reviewed the above referenced report, The Quarterly Monitoring Report, 3<sup>rd</sup> Quarter, 2003, submitted by RMT Inc., for the Dayco L.E. Carpenter Superfund site in Wharton, New Jersey, and is pleased to provide the following comments on the attachment for your consideration.

If you have any questions or comments on this letter, please contact me at (212) 637-4411. Thank you for the opportunity to review the above work plan.

Yours truly,

Stephen Cipot, Remedial Project Manager  
Southern New Jersey Remediation Section

Enclosure

cc: Robert Alvey, PSB  
Angela Carpenenter, SNJRS  
Francis Zizila, ORC

bcc: Stephen Cipot, SNJRS

354554



Comments on The Quarterly Monitoring Report, 3<sup>rd</sup> Quarter, L.E. Carpenter Superfund Site, Wharton, New Jersey

General Comment

We concur with the assessment in the report that the apparent free product thickness in recovery well MW-3, at the eastern downgradient edge of the LNAPL free product area, roughly doubled to 0.93 feet in comparison with the April 2003 measurements. Measurable free product was observed in 15 of the 69 wells monitored in August. Previous reports have estimated between 8,000 and 13,000 gallons of recoverable free product remain in the saturated zone. The recovery of free product during the quarter was roughly only 50 gallons, and since 1997 approximately 3,900 gallons have been recovered, leaving a large amount of product unrecoverable by currently employed technology. Therefore, we look forward to the expedited LNAPL remediation that has been proposed for this area by the Potentially Responsible Party (PRP). In addition, for reasons stated below, we believe that the May 2001 Monitored Natural Attenuation (MNA) Work Plan should be implemented without further delay, especially in the MW-19 area, which has not been sampled since June 2002.

Specific Comments

1. Page 2-2, West-Central Region of Free Product. The text states "the total volume of apparent free product increased from .39 gallons in July 2003 to 1.31 gallons in September 2003." Based on the data, this statement does not make sense. There is a 1 foot thickness contour shown on Figure 3. Please provide an explanation of this discrepancy. The data in Table 2 indicates maximum historic total free product at about 30 gallons throughout the site. If this amount is strictly what is within the well borehole, that fact should be noted.
2. Figure 3. No reason is provided for why 0.93 ft. apparent thickness of LNAPL was observed at this location, so far away from the main body of LNAPL. It seems likely that a thin stringer has wound its way to this location. This area is a concern, and some explanation should be noted in the text.
3. Page 3-1. The MNA work plan, dated May 2001, is stated as not yet having been implemented other than for some of the low-flow sampling procedures. Since 2001, various PRP's reports and communications have consistently reiterated that implementation of the actual work plan has been delayed until after the LNAPL and lead areas were to have been remediated under the submitted 2002 FFS). In addition to the LNAPL area, the MNA work plan called for the installation of 3 additional monitoring wells in the MW-19 area, and implementing the actual work plan would have generated a large amount of useful monitoring information by now in the MN-19 area. I believe the 3 new wells outlined in the MNA work plan had been installed in late 2001, however, as you may recall, the MW-19 area has not been sampled since June 2002.

While the PRP's contractor has recently agreed to sample all MW-19 wells in the December 2003 sampling event, the MNA work Plan should be implemented in this area, as well. EPA provided comments via letter dated August 10, 2001, on the MNA work plan, and the plan was subsequently approved by the NJDEP in January 2002. It should be noted that EPA's comment labeled "e," had requested that natural attenuation parameters be collected quarterly, as this will allow for the evaluation of key trends, as well as possible seasonal variations.

4. The PRP has submitted a letter dated December 9, 2003, formally requesting to withdraw the FFS, which had outlined a proposal to cap lead contaminated soils on-site, to instead implement the remedy outlined in the 1994 Record of Decision, with the exception that soils impacted above 400 ppm would be remediated, instead of the 600 ppm outlined in the original ROD. While the PRP's letter did not specifically state it was still their intent to proceed with remediating the LNAPL area, as had been outlined in the FFS, based on several conversations and the meeting on October 7, 2003, with the PRP's contractor, we were assured that this is in fact the case. Presumably, details for the LNAPL remediation will be provided in the forthcoming Remedial Design Work Plan. Moreover, please note that based on the "tentative" mobilization for LNAPL free product remedial activity outlined in the 3<sup>rd</sup> Quarterly Monitoring Report, for August\September 2004, is no longer a reasonable assumption since the December 9 letter proposed that lead remedial action would commence in the Spring of 2005. It should also be noted that while the FFS included remedial strategies for both the lead and LNAPL areas, it did not deal with the MW-19 area. Therefore, it is no longer a reasonable assumption to delay implementation of the MNA work plan, especially not for the MW-19 area, as noted above. And while it is reasonable to delay full implementation of the MNA work plan in the LNAPL area until remediation is complete, we believe it is also a good idea to monitor for MNA components quarterly, as noted above. The text in the 3<sup>rd</sup> Quarterly Monitoring Report, and future reports, should be updated to include a more reasonable time frame for implementation of the MNA work plan in the LNAPL area in addition to the MN-19 area, as well as include a remediation schedule for the LNAPL area. This would especially be prudent if for some unforeseen reason the remedial action does not proceed according to the proposed schedule, it would not be too early to anticipate starting the MNA work plan as soon as possible in early 2004, especially in the MW-19 area. Therefore, we request that a schedule for implementing the MNA work plan, also be listed in relevant future reports and work plans.
5. Table 6. Groundwater Elevations. For future reports, it is recommended that historic maximum and minimum groundwater elevations be noted on the table. In addition, we would like the PRP to please explain how product thicknesses are calculated

based on product elevation and water elevation. We cannot compute the 0.38 ft thickness shown for CW-1 using the elevations shown on the table. Nor can we use this data to check the consultant's assertion that there is an upward groundwater flow from the bedrock or deeper aquifer system. One well pair, MW-14, appears to have opposite data. Please note, it is not necessary to include all well installation and survey details on the table.



# State of New Jersey

Department of Environmental Protection

James E. McGreevey  
Governor

Bradley M. Campbell  
Commissioner

Christopher Anderson  
Director Environmental Affairs  
L.E. Carpenter and Company  
33587 Walker Road  
Avon Lake, OH 44012

RE: L.E. Carpenter Superfund Site  
Wharton, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the Quarterly Monitoring Report – 3rd Quarter 2003 (Final) dated October 30, 2003. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). NJDEP finds the document to be acceptable provided the following comments are addressed.

## General Comment:

NJDEP previously noted an increase in the DEHP levels in well MW-11D(R). This well monitors the deep overburden aquifer and is located within the product plume. The deep overburden aquifer is unimpacted by site related contamination, but recently there had been a steady increase in DEHP levels, followed by non-detect for two quarters. Should the upward trend resume, measures to control the downward migration of DEHP may be necessary.

## Specific Comments:

### 1. Section 5, Drainage Channel Surface Water Sampling, page 5-1:


The report states that the surface water data show that BTEX and DEHP constituents dissolved in groundwater are naturally attenuating, and that migration of these primary constituents of concern is not taking place. NJDEP cannot concur at this time and has previously requested PDB sampling to confirm whether VO contaminants are discharging to the ditch and/or the Rockaway River.

### 2. Section 6.3, PDB Sampling in Drainage Ditch, page 6-2:

The report states that LE anticipates collection of samples using PDB sampling devices during the fourth quarter of 2003. LE shall submit a figure with the proposed locations in the drainage ditch and Rockaway River prior to the scheduled installation of PDB samplers.

Should you have any further questions please feel free to contact me at (609) 633-1416.

Sincerely,

  
Anthony Cinque, Case Manager  
Bureau of Case Management

C: Nick Clevett, RMT, Inc.  
Stephen Cipot, EPA  
George Blyskun, BGWPA  
John Prendergast, BEERA